



December 6, 2022

VIA ECF

Honorable Sean H. Lane
United States Bankruptcy Court
300 Quarropas Street
White Plains, New York 10706

Lori Schwartz
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Re: 85 Flatbush RHO Mezz LLC, 85 Flatbush RHO Hotel, LLC and 85 Flatbush
RHO Residential LLC, (“Debtors”)
Chapter 11 Bankruptcy Case No. 20-23280 (SHL)

Dear Judge Lane:

We write on behalf of the Debtors, 85 Flatbush RHO Mezz, LLC, 85 Flatbush RHO Hotel, LLC and 85 Flatbush RHO Residential LLC, and with the consent of counsel to TH Holdco LLC (“TH Holdco”) and Sam Rubin (“Rubin”). Representatives of the Debtors, TH Holdco, and Rubin, along with their respective counsel, and the hotel’s former manager, amongst other attendees, met this afternoon at the hotel premises. Significant progress was made at today’s meeting in resolving the open issues related to the November 9, 2022 credit bid closing.

The parties have agreed to extend the pending deadlines set forth below as they continue to work collaboratively to conclude these matters. To that end, the parties have agreed to adjourn the evidentiary hearing scheduled for Monday, December 12, 2022 at 2:00 pm for approximately one week, subject to the Courts availability. In addition, the parties agreed to extend the December 7, 2022 deadline for TH Holdco to file their 2004 reply and letter regarding the framework for the evidentiary hearing and witness list for a week to December 14, 2022.

We respectfully request that the December 12, 2022 evidentiary hearing be carried to December 19, 2022 or such available date as the Court can accommodate.

Please have your chambers contact me with any questions or if the Court requires any additional information.

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Respectfully submitted,

/s/ Lori A. Schwartz
Lori A. Schwartz

cc: Robert Richards, Esq.
Lauren Macksoud, Esq.
Sarah M. Schrag, Esq.
Paul Aloe, Esq.
(via ECF)